

Chuck Divine  
Inwood Office Furniture  
1108 E. 15<sup>th</sup> Street  
Jasper, Indiana 47546

Re: 037-10817  
First Significant Permit Modification to  
Part 70 No.: T 037-6048-00012

Dear Mr. Divine:

Inwood Office Furniture was issued a permit on December 21, 1998 for a wood furniture manufacturing plant. A letter requesting changes to this permit was received on January 27, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The source would like a PSD minor limit condition added to their permit. The source status in Condition A.1 has been changed to Minor under PSD. Therefore, the following conditions have been added to Section D.2 (the numbering of the conditions in Section D.2 have been changed to reflect the addition of the following conditions):

---

**D.2.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]**

The source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents per year. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

---

**D.2.10 (new condition to show compliance with D.2.2) VOC Emissions**

Compliance with Condition D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) consecutive period.

---

**D.2.11 (now renumbered D.2.13) Record Keeping Requirements**

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.2.2
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOC's emitted for each compliance period.

D.2.12 (now renumbered D.2.14) Reporting Requirements

- (a) **A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.**

Additionally, the following condition only applies to booth 011, not the entire surface coating operation. Therefore, the following change has been made to the condition:

D.2.3 (now renumbered D.2.4) Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to **wood furniture in booth 011**, ~~wood furniture~~ shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and Drain Application

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Karen Purtell, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Karen Purtell or extension 3-2803, or dial (317) 233-2803.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments  
KLP

cc: File - Dubois County  
U.S. EPA, Region V  
Dubois County Health Department  
Air Compliance Section Inspector - Ray Schick  
Compliance Data Section - Mindy Jones  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Inwood Office Furniture Co., Inc.  
1108 E. 15th Street  
Jasper, Indiana 47546**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: <b>T037-6048-00012</b>	
Original Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 21, 1998
Significant Permit Modification No.:037-10817-00012	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

## **A SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### **A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]**

---

The Permittee owns and operates a furniture manufacturing plant.

Responsible Official: Glen M. Sturm  
Source Address: 1108 E. 15th Street, Jasper, IN 47546  
Mailing Address: P.O. Box 646, Jasper, IN 47547-0646  
SIC Code: 2521  
County Location: Dubois  
County Status: Attainment for all criteria pollutants  
Source Status: Minor Source under PSD  
Part 70 Permit Program  
Major Source, Section 112 of the Clean Air Act

### **A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]**

---

This stationary source consists of the following emission units and pollution control devices:

- (a) Woodworking operations 014, with a maximum rating of 2750 pounds per hour. Emissions shall be controlled by a baghouse, then exhausted at stack N.
- (b) Surface coating booths 01-012, consisting of the following:
  - (1) One (1) contact glue booth 01, with a maximum rating of 11.1 units per hour. Emissions shall be controlled by dry filters, then exhausted at stack A.
  - (2) Three (3) stain booths 02-04, with a maximum rating of 3 units per hour each. Emissions shall be controlled by dry filters, then exhausted at stacks B, C and D.
  - (3) One (1) wipe stain booth 05, with a maximum rating of 10 units per hour. Emissions shall be controlled by dry filters, then exhausted at stack E.
  - (4) One (1) sealer booth 06, with a maximum rating of 10 units per hour. Emissions shall be controlled by dry filters, then exhausted at stack F.
  - (5) One (1) lacquer booth 07, with a maximum rating of 10 units per hour. Emissions shall be controlled by dry filters, then exhausted at stack G.
  - (6) One (1) lacquer booth 08, with a maximum rating of 8 units per hour. Emissions shall be controlled by dry filters, then exhausted at stack H.

## D.2 FACILITY OPERATION CONDITIONS - Surface Coating Booths

### Facility Description [326 IAC 2-7-5(15)]

Twelve (12) surface coating booths, identified as units 01-012, with dry filters for control. Unit 01 exhausts to stack A; Unit 02 exhausts to stack B; Unit 03 exhausts to stack C; Unit 04 exhausts to stack D; Unit 05 exhausts to stack E; Unit 06 exhausts to stack F; Unit 07 exhausts to stack G; Unit 08 exhausts to stack H; Unit 09 exhausts to stack I; Unit 010 exhausts to stack J; Unit 011 exhausts to stack K; and Unit 012 exhausts to stack L.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

#### D.2.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents per year. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.2.3 Nonattainment Area Particulate Matter Emission Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, particulate matter emissions from each of the twelve (12) surface coating booths (01 through 012) shall not exceed 0.03 grains per dry standard cubic foot.

#### D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture in booth 011, shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pound per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

#### D.2.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.

- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
- (1) Limit the volatile hazardous air pollutant (VHAP) emissions from finishing operations as follows:
    - (A) Achieve a weighted average VHAP content across all coatings of 1.0 pound VHAP per pound solids; or
    - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. All other thinners have a 10.0 percent maximum VHAP content by weight; or
    - (C) Use a control device to limit emissions; or
    - (D) Use a combination of (A), (B), and (C).
  - (2) Limit VHAP emissions contact adhesives as follows:
    - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
    - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed 1.0 pound VHAP per pound solid.
    - (C) Use a control device to limit emissions.
  - (3) The strippable spray booth material shall have a maximum VOC content of 0.8 pounds VOC per pound solids.

**D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

**D.2.7 Work Practice Standards [40 CFR 63.803]**

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.

- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line Cleaning.
- (i) Gun Cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

### **Compliance Determination Requirements**

#### **D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)][40 CFR 63, Subpart JJ]**

---

- (a) Pursuant to 40 CFR 63, subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, subpart JJ and 326 IAC 3-6.
- (b) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.2.2 D.2.3 and D.2.5 shall be determined by performance tests conducted in accordance with Section C - Performance Testing.

#### **D.2.9 Volatile Organic Compounds (VOC)**

---

Compliance with VOC content limitations contained in Condition D.2.5 shall be determined pursuant to 326 IAC 8-1-4(a) and 326 IAC 8-1-2(a), using formulation data supplied by the coating manufacturer. The OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedure specified in 326 IAC 8-1-4.

#### **D.2.10 VOC Emissions**

---

Compliance with Condition D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) consecutive month period.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.2.11 Particulate Matter (PM)**

---

The dry filters for PM overspray control shall be in operation at all times when the twelve (12) surface coating booths are in operation.

#### **D.2.12 Monitoring**

---

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.2.13 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.2.2
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOC's emitted for each compliance period.
- (b) To document compliance with Condition D.2.5 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.2.5.
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The VHAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.2.7, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Conditions D.2.11 and D.2.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.



#### D.2.14 Reporting Requirements

---

- (a) A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) An Initial Compliance Report to document compliance with Condition D.2.5, and the Certification form shall be submitted within sixty (60) calendar days following the compliance date of December 7, 1998. The initial compliance report must include data from the entire month that the compliance data falls.
- (c) A semi-annual Continuous Compliance Report to document compliance with Condition D.2.5, and the Certification form shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
- (2) July 1 through December 31.
- (d) The reports required in (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Inwood Office Furniture Co., Inc.  
Source Address: 1108 E. 15<sup>th</sup> Street, Jasper Indiana 47547  
Mailing Address: P.O. Box 646, Jasper, Indiana 47547-0646  
Part 70 Permit No.: T037-6048-00012  
Facility: Surface Coating Operations  
Parameter: VOC  
Limit: less than 250 tons per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit**

#### **Source Background and Description**

<b>Source Name:</b>	<b>Inwood Office Furniture Co., Inc.</b>
<b>Source Location:</b>	<b>1108 E. 15<sup>th</sup> Street, Jasper, Indiana 47546</b>
<b>County:</b>	<b>Dubois</b>
<b>SIC Code:</b>	<b>2521</b>
<b>Operation Permit No.:</b>	<b>T037-6048-00012</b>
<b>Operation Permit Issuance Date:</b>	<b>December 21, 1998</b>
<b>Permit Modification No.:</b>	<b>037-10817-00012</b>
<b>Permit Reviewer:</b>	<b>Karen Purtell</b>

The Office of Air Management (OAM) has reviewed a modification application from Inwood Office Furniture Co., Inc. relating to the operation of a wood furniture manufacturing plant.

#### **History**

On January 27, 1999, Inwood Office Furniture, requested a PSD minor limit condition be added to their permit. Inwood Office Furniture, was issued a Part 70 permit on December 21, 1998. The source has potential emissions greater 250 tons per year and actuals have never exceeded 250 tons per year. The source does not wish to be considered a major source and has asked for a PSD minor limit condition.

#### **Existing Approvals**

The submitted an application on June 4, 1996 for a Part 70 Operating Permit. A Part 70 Permit, number T037-6048-00012, was issued on December 21, 1998. The source has been operating under previous approvals including, but not limited to, the following:

- (1) OP 19-10-90-0291, issued on December 10, 1986;
- (2) Exemption letter, issued August 24, 1990

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Recommendation**

The staff recommends to the Commissioner that the Significant Permit Modification be approved.

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

### Emission Calculations

No new calculations were made for this modification.

### Potential To Emit and Actual Emissions

See Technical Support Document of original TV Permit.

### Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Surface coating	---	---	---	less than 250	---	---	---
woodworking	22.22	---	---	---	---	---	---
Total Emissions	22.22	---	---	less than 250	---	---	---

### Federal Rule Applicability

There are no changes in Federal rule applicability from the original TV permit.

### State Rule Applicability - Surface Coating Booths

#### PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]

The source shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents per year. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable

#### Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture in **booth 011**, ~~wood furniture~~ shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pound per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

### **Compliance Requirements**

The Permittee shall maintain records in accordance with (1) through (5) below. The Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the less than 250 tons per twelve (12) consecutive month period VOC usage limit established in the permit.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOC's emitted for each compliance period.

### **Air Toxic Emissions**

There are no changes in the air toxic emissions due to this modification.

### **Conclusion**

The modification of this source will be subject to the conditions of the attached Significant Permit Modification No: 037-10817-00012.